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Attorneys for Gleam Holdings, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUIGI ABREU, Individually, and On Behalf of
All Others Similarly Situated,

Plaintiff,

Index No.: 1:22-cv-1331-CM

- against-

NOTICE OF MOTION

GLEAM HOLDINGS, INC.,

Defendant.

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PLEASE TAKE NOTICE that upon the annexed declaration of Melanie Mills, executed on April 28, 2022 and the accompanying memorandum of law, and the prior pleadings and proceedings herein, defendant Gleam Holdings, Inc. shall move this Court, before Hon. Colleen McMahon, United States District Court Judge, at the United States Court House at 500 Pearl Street, New York, New York 10007, on a date and at a time to be set by the Court, for an order as follows:
(i) dismissing Plaintiff's complaint pursuant to Fed. R. Civ. P. 12(b)(1). (2) & (6) for lack of standing, lack of personal jurisdiction and failure to statement a claim; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: April 29, 2022

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By:



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